

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KAREN WHITE,

Plaintiff,

v.

CIVIL ACTION NO. 3:12cv00115

BMW OF NORTH AMERICA, LLC.,

Defendant

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S EXHIBITS

COMES NOW, the Plaintiff, KAREN WHITE, by counsel, and objects to Defendant's Exhibits as follows:

1. Defendant's Exhibit 2001 (Defendant BMWNA's F.R.C.P. 26(A)(1) Disclosures.

Plaintiff objects on the following grounds:

- (a) Fed. R. Evid. 402 (Irrelevant);
- (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);

2. Defendant's Exhibit 2002 (Defendant's Expert Report of Brian Sime). Plaintiff objects on the following grounds:

- (a) Fed. R. Evid. 402 (Irrelevant);
- (b) Fed. R. Evid. 403 (Unfairly prejudicial and confusing);
- (c) Fed. R. Evid. 701 (Not an expert);
- (d) Fed. R. Evid. 703 (Expert report based on inadmissible documents and facts);
- (e) Rule 37(c) (1).

Respectfully submitted,
KAREN WHITE,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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